

KEITH M. KIUCHI, ALC  
KEITH M. KIUCHI #2735  
American Savings Bank Tower  
1001 Bishop Street, Suite 985  
Honolulu, HI 96813  
Tel. No.: (808) 533-2230  
FAX No.: (808) 533-4391

Attorney for Petitioner

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

TRACY YOSHIMURA,	)	S.P. NO. _____
	)	(Other Civil Action)
Petitioner,	)	
	)	PETITION FOR IMPEACHMENT OF
vs.	)	PROSECUTING ATTORNEY KEITH M.
	)	KANESHIRO PURSUANT TO SEC.
KEITH M. KANESHIRO,	)	12-203 OF THE HONOLULU CITY
	)	CHARTER; DECLARATION OF TRACY
Respondent.	)	YOSHIMURA; EXHIBITS "1" - "5";
	)	MEMORANDUM OF LAW IN SUPPORT
	)	OF PETITION; NOTICE OF
	)	HEARING ON PETITION and
	)	CERTIFICATE OF SERVICE
	)	
	)	Hearing Date: _____
	)	Hearing Time: _____
	)	Judge: _____
_____	)	

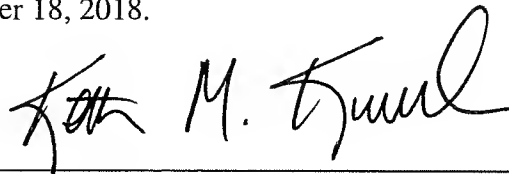
**PETITION FOR IMPEACHMENT OF PROSECUTING ATTORNEY KEITH M.  
KANESHIRO PURSUANT TO SEC. 12-203 OF THE HONOLULU CITY CHARTER**

**COMES NOW** Petitioner TRACY YOSHIMURA, by and through his attorney KEITH M. KIUCHI, and hereby moves this Court both on his behalf and on behalf of the more than 500 duly registered voters of the City and County of Honolulu, as set forth in Exhibit "1" attached hereto, pursuant to Sec. 12-203 of the Honolulu City Charter, for the impeachment of

Respondent Keith M. Kaneshiro, as Prosecuting Attorney for the City and County of Honolulu for malfeasance, misfeasance or non-feasance in office.

This Petition is brought pursuant to Sec. 12-203 of the Honolulu City Charter, HRS § 603-21.5(a)(4), and Rule 81(b)(11) of the Hawaii Rules of Civil Procedure and is based upon the attached Declaration of Tracy Yoshimura, Exhibits “1” – “5” attached hereto, the attached Memorandum of Law in Support of Petition and such other matters as may be brought before the court in the hearing on this matter.

DATED: Honolulu, Hawaii, December 18, 2018.

A handwritten signature in black ink, appearing to read "Keith M. Kiuchi", written over a horizontal line.

KEITH M. KIUCHI

Attorney for Petitioner

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

TRACY YOSHIMURA,	)	S.P. NO. _____
	)	(Other Civil Action)
Petitioner,	)	
	)	DECLARATION OF TRACY
vs.	)	YOSHIMURA
	)	
KEITH M. KANESHIRO,	)	
	)	
Respondent.	)	
_____	)	

**DECLARATION OF TRACY YOSHIMURA**

TRACY YOSHIMURA, declares and states:

1. That I am the Petitioner in the above-entitled matter.
2. That all of the facts set forth in this Declaration are within my personal knowledge.
3. Exhibit "1" attached hereto is a list, in Excel spreadsheet form, of approximately 800 plus individuals who have agreed with a petition for impeachment of Keith M. Kaneshiro, as Prosecuting Attorney for the City and County of Honolulu, the Respondent in the above-entitled matter. The petition was placed on Change.Org, which is a website designed to collect on line signatures, on which individuals could log on and sign the petition electronically. All of these individuals have signed electronically agreeing to the petition. The petition was put out requesting signatures from registered voters in Honolulu. The instructions stated that the petition needed to be signed by duly registered voters in the City and County of Honolulu. The Petitioner acknowledges that some of the individuals that have signed the petition may NOT be duly registered voters in the City and County of Honolulu.

4. Exhibit “2” attached hereto is the content of the petition that was posted on line with Change.Org.

5. That the aforesaid petition asserts that Respondent Keith M. Kaneshiro committed malfeasance, misfeasance or non-feasance in office, to wit, the following:

A. As prosecutor failing to take appropriate action as to former Deputy Prosecutor Katherine Kealoha, when it was widely known that the FBI and the United States Justice Department were actively investigating potential criminal acts she was suspected of committing and or had participated in. Prosecutor Kaneshiro failed to take reasonable or necessary “administrative” actions to protect the integrity of any or all, past and present prosecutions that she either had, or was currently participating in or supervising. His failure to take immediate administrative measures to avoid compromising the status of all legal matters she had or was associated with, poses a severe public safety issue, since “if” she is convicted, any and every case she has ever participated in, or supervised, could be challenged on the grounds of her questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom she may have supervised or worked with.

B. As prosecutor failing to take appropriate action as to Deputy Prosecuting Attorney Chasid Sapolu, since it has been made known via a “Subject Letter” from the Special U.S. Attorney of the United States Department of Justice, that Deputy Prosecutor Chasid Sapolu is the “subject” of a federal grand jury investigation. Prosecutor Kaneshiro has again failed to take reasonable or necessary “administrative” actions to protect the integrity of any or all, past and present prosecutions that he either had, or is currently participating in or supervising. Prosecutor Kaneshiro’s failure to take immediate administrative measures to protect the status of

all legal matters Deputy Chasid Sapolu had or was associated with, poses a severe public safety issue; since “if” he is convicted, any and every case he has ever participated in or supervised, could be challenged on the grounds of his questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys.

C. As prosecutor failing to take appropriate action as to Deputy Prosecutor Jan Futa, since it has been made known via a “Subject Letter” from the Special U.S. Attorney of the United States Department of Justice, that Deputy Prosecutor Jan Futa is the “subject” of a federal grand jury investigation. Prosecutor Kaneshiro has again failed to take reasonable or necessary “administrative” actions to protect the integrity of any or all, past and present prosecutions that she either had, or is currently participating in, or supervising. Prosecutor Kaneshiro’s failure to take immediate administrative measures to protect the status of all legal matters Deputy Prosecutor Jan Futa had or was associated with, poses a severe public safety issue; since “if” convicted, any and every case she has ever participated in could be challenged on the grounds of her questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom she may have supervised or worked with.

D. It has been confirmed that City and County of Honolulu Prosecutor Keith M. Kaneshiro has himself received official notification via a “Target Letter” from the Special U.S. Attorney of the United States Department of Justice informing him that he is the “Target” of a federal Investigation. However, Prosecutor Kaneshiro failed to immediately notify appropriate officials of the City and County of Honolulu and/or State of Hawaii that he received this official notice, and currently chooses to remain in his position as The Prosecutor for the City and County of Honolulu, where he supervises, directs and oversees all of the cases and employees in that

agency's office. By remaining in this position, Prosecutor Keith Kaneshiro has already jeopardized, and is further jeopardizing the integrity of ANY and ALL past and present criminal cases and investigations which his office has prosecuted under his supervision or employment; since "if" he is convicted, any and every case he has ever participated in or supervised, could be challenged on the grounds of his questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom he may have supervised or worked with.

6. Exhibit "3" attached hereto is a true and correct copy of news stories on the website of Hawaii News Now, on December 17, 2018 and on December 10, 2018. These articles show that Keith M. Kaneshiro received a target letter from the U.S. Department of Justice amid: "a widening public corruption probe".

I declare, under penalty of law, that the foregoing is true and correct to the best of my information and belief.

DATED: Honolulu, Hawaii, December 18, 2018.



---

TRACY YOSHIMURA



EXHIBIT 1

	Name	City	State	Postal Code	Country	Signed On
1	Tracy Yoshimura	Mililani	HI	96789	US	12/11/2018
2	Aaron Tampos	Ewabeach	HI	96706	US	12/11/2018
3	Kawika Delgado	Honolulu	HI	96797	US	12/11/2018
4	earl stone jr	Honolulu	HI	96817	US	12/11/2018
5	donovan ho	Ewa Beach	HI	96706	US	12/11/2018
6	Michael Gatewood	Honolulu	HI	96826	US	12/11/2018
7	Edgar Namoca	Ewa Beach	HI	96706	US	12/12/2018
8	Arthur Shimamura	Kailua	HI	96734	US	12/12/2018
9	kevin kunz	San Diego	CA	92109	US	12/12/2018
10	Helen Ettlinger	Kaneohe	HI	96744	US	12/12/2018
11	Stephen Friez	Aiea	HI	96801	US	12/12/2018
12	Clinton Billington	Honolulu	HI	96818	US	12/12/2018
13	Dustin Malama	Aiea	HI	96701	US	12/12/2018
14	Stephanie Elento	Waipahu	HI	96797	US	12/12/2018
15	Wayne Elento	Waipahu	HI	96797	US	12/12/2018
16	Joseph Balasbas	Ewa Beach	HI	96706	US	12/12/2018
17	Donald Dole	Honolulu	HI	96825	US	12/12/2018
18	Paul Patterson	Honolulu	HI	96825	US	12/12/2018
19	Cheryl Richards	Waipahu	HI	96797	US	12/12/2018
20	Charles Baugh	Honolulu	HI	96813	US	12/12/2018
21	michael bare	Haiku	HI	96708	US	12/12/2018
22	Bryan Santiago	Waianae	HI	96792	US	12/12/2018
23	Vincent Bergan	Kaneohe	HI	96744	US	12/12/2018
24	Mary Baldauf	Kaneohe	HI	96744	US	12/12/2018
25	MICHAEL BERGLUND	Honolulu	HI	96813	US	12/12/2018
26	Jacob Lopaka Decker	Honolulu		96817	Canada	12/12/2018
27	Wendi Chong-Viernes	Honolulu	HI	96819	US	12/12/2018
28	Elizabeth Keaulana	Honolulu	HI	96816	US	12/12/2018
29	Leif Sasada	Hoolehua	HI	96729	US	12/12/2018
30	mary ann oros	Kaneohe	HI	96744	US	12/12/2018
31	Shelden Miguel	Pahoa	HI	96778	US	12/12/2018
32	Jennifer Takahashi	Kailua	HI	96734	US	12/12/2018
33	Stephen Hazam	Honolulu	HI	96813	US	12/12/2018
34	Christopher Roane	Waianae	HI	96792	US	12/12/2018
35	Edward Bruffey	Haleiwa	HI	96712	US	12/12/2018
36	Brandon Santiago	Honolulu	HI	96818	US	12/12/2018
37	christina sanchez	Hilo	HI	96720	US	12/12/2018
38	Leanne Lukela	Kailua	HI	96734	US	12/12/2018



359	Liam Deeley	Kailua	HI	96734	US	12/13/2018
360	William Scheele	honolulu	HI	96814	US	12/13/2018
361	Ramsey Kihano	Honolulu	HI	96789	US	12/13/2018
362	Shane Agena	Honolulu	HI	96818	US	12/13/2018
363	Bruce Tam-Hoy	Waipahu	HI	96797	US	12/13/2018
364	Christopher Kirk	Kapaa	HI	98034	US	12/13/2018
365	Lisa Won	Honolulu	HI	96825	US	12/13/2018
366	Nicolette Alpichi	Kaneohe	HI	96744	US	12/13/2018
367	James Logue	Honolulu	HI	96817	US	12/13/2018
368	John Lopez	Honolulu	HI	96817	US	12/13/2018
369	Bradford A Helm Helm	Kaneohe	HI	96734	US	12/13/2018
370	Leon Botelho	Kaneohe	HI	96744	US	12/13/2018
371	Devin Statts	Honolulu	HI	96819	US	12/13/2018
372	Tracy Newman	Kailua	HI	96734	US	12/13/2018
373	Michelle Williams	Kapolei	HI	96707	US	12/13/2018
374	Steve Dunbar	Ewa Beach	HI	96706	US	12/13/2018
375	Kapiolani Naiwi	Waianae	HI	96792	US	12/13/2018
376	Crystal Ahyo	Hilo	HI	96720	US	12/13/2018
377	Marsha Griffith	Dewey	AZ	86327	US	12/13/2018
378	Jax Graves	Mililani	HI	96789	US	12/13/2018
379	Aaron Nakatsuji	Honolulu	HI	96813	US	12/13/2018
380	Joann Molitau	Honolulu	HI	96816	US	12/13/2018
381	Tamara Limasa	Kailua	HI	96734	US	12/13/2018
382	Bev Dawkins	Waianae	HI	96792	US	12/13/2018
383	Fina Wells	Honolulu	HI	96816	US	12/13/2018
384	cindy n	Honolulu	HI	96817	US	12/13/2018
385	Bryan Dela Cruz	Honolulu	HI	96819	US	12/13/2018
386	John Burns	Honolulu	HI	96813	US	12/13/2018
387	Risa Watanabe	Honolulu	NM	87124	US	12/13/2018
388	Jesse Iwamoto	Rio Rancho	HI	96793	US	12/13/2018
389	Cheryl Woodard	Wailuku	HI	96793	US	12/13/2018
390	Brandon Dalere	LaBelle	FL	33935	US	12/13/2018
391	J I	Waipahu	HI	96797	US	12/13/2018
392	Jennifer Killinger	Waianae	HI	96792	US	12/13/2018
393	Carl Eslava	Honolulu	HI	96822	US	12/13/2018
394	Heather Rapoza	Ewa Beach	HI	96706	US	12/13/2018
395	Lincoln Naiwi	Pearl City	HI	96782	US	12/13/2018
396	Michelle Lithgow	Waianae	HI	96792	US	12/13/2018
397	Julie Azzarello	Happy Valley	OR	97086	US	12/13/2018
398	Keoni Tamashiro	Spokane	WA	99223	US	12/13/2018
		Honolulu	HI	96817	US	12/13/2018

399	Elva Higashi	Kaneohe	HI	96744	US	12/13/2018
400	Adina Comilla	Waipahu	HI	96744	US	12/13/2018
401	Jon Santos	Honolulu	HI	96815	US	12/13/2018
402	Chris Botelho	Kaneohe	HI	96744	US	12/13/2018
403	Doris Sagucio	Ewa Beach	HI	96706	US	12/13/2018
404	Rylan Sugimoto	Honolulu	HI	96814	US	12/13/2018
405	Caroline Yamashita	Ewa beach	HI	96706	US	12/13/2018
406	alan piiohia	Honolulu	HI	96825	US	12/13/2018
407	Mark Kim	Honolulu	HI	96817	US	12/13/2018
408	Davin Anderson	Kapolei	HI	96707	US	12/13/2018
409	Derek Kajihiro	Mililani	HI	96789	US	12/13/2018
410	Alex Rodriguez	Ewa Beach	HI	96706	US	12/13/2018
411	Doreen Miyakawa	Kaneohe	HI	96744	US	12/13/2018
412	Delvid Koike	Lahaina	HI	96761	US	12/13/2018
413	Keola Yasso	Kualapuu	HI	96757	US	12/13/2018
414	Caro Williams	Pearl City	HI	96782	US	12/13/2018
415	Darin Haitzuka	Kaneohe	HI	96744	US	12/13/2018
416	Ren Edwards	Waianae	HI	96792	US	12/13/2018
417	Barbara Soo	Honolulu	HI	96813	US	12/13/2018
418	michael suekawa	mililani	HI	96789	US	12/13/2018
419	Megan McLain	Honolulu	HI	96813	US	12/13/2018
420	Kevin Kaawa	Waianae	HI	96792	US	12/13/2018
421	Genovia Francis	Wahiawa	HI	96786	US	12/13/2018
422	Lana Ululani Robbins	Kirkland	WA	98083	US	12/13/2018
423	Marlene Perdido	Warren	MI	48089	US	12/13/2018
424	Valerie Covert	Makawao	HI	96768	US	12/13/2018
425	Timothy Wong	Honolulu	HI	96825	US	12/13/2018
426	John Burke	Kula	HI	96790	US	12/13/2018
427	Chyne Camacho	Kapolei	HI	96707	US	12/13/2018
428	Heather Kribell	Waialua	HI	96791	US	12/13/2018
429	Sara Lum	Pearl City	HI	96782	US	12/13/2018
430	Joel Cosseboom	Honolulu	HI	96822	US	12/13/2018
431	Bruce cornelison	Honolulu	HI	96826	US	12/13/2018
432	Meghan Van Bergeijk	Kailua	HI	96734	US	12/13/2018
433	Tr?ng Phan	Honolulu		96817	US	12/13/2018
434	lawrence agaran	Kahului	HI	96732	US	12/13/2018
435	John Amar	Kapaa	HI	96755	US	12/13/2018
436	larry wong	kapaau	HI	96755	US	12/13/2018
437	Chance King	Haleiwa	HI	96712	US	12/13/2018
438	JoAnn Haee	Waianae	HI	96792	US	12/13/2018

439	Kim Krell	Kurtistown	HI	96760	US	12/13/2018
440	Nicholas Wong	Honolulu	HI	96821	US	12/13/2018
441	Stuart Wilson	Makawao	HI	96768	US	12/13/2018
442	Kehau Kerisiano	Waipahu	HI	96797	US	12/13/2018
443	Fran Maialoha	Aiea	HI	96701	US	12/13/2018
444	Pauline Auelua-Sugimoto	Waipahu	HI	96797	US	12/13/2018
445	Dylan Delahanty	Spout Spring		24593	US	12/13/2018
446	Reginald Alapai	Honolulu	HI	96792	US	12/13/2018
447	Shane Marfil	Waianae	HI	96792	US	12/13/2018
448	Emilie Rankin	Fredericksburg		22407	US	12/13/2018
449	Steven Cook	Wailuku	HI	96793	US	12/13/2018
450	Ieilani auld	Kapolei	HI	96707	US	12/13/2018
451	Gerald Dungca	Waianae	HI	96792	US	12/13/2018
452	James Martin	Kapolei	HI	96707	US	12/13/2018
453	Joshua Auld	Kapolei	HI	96707	US	12/13/2018
454	Clarence Kalima	Mililani	HI	96789	US	12/13/2018
455	Luke Sarvis	Honolulu	HI	96816	US	12/13/2018
456	Dee Ann De Mattos-Morreira	Kula	HI	96790	US	12/13/2018
457	Primrose Kanana	Honolulu	HI	96819	US	12/13/2018
458	G Aleka	West Covina	CA	91792	US	12/13/2018
459	Amber Alexander	Pearl City	HI	96782	US	12/13/2018
460	Frank Macali	hauula	HI	96717	US	12/13/2018
461	Roxanne Highland	Kailua Kona	HI	96740	US	12/13/2018
462	Michael Krouse	Kailua	HI	96734	US	12/13/2018
463	Marlee Kamakaala	Hauula	HI	96717	US	12/13/2018
464	Kiku Khan	Mililani	HI	96789	US	12/13/2018
465	Gloria Carney	Kaneohe	HI	96744	US	12/13/2018
466	Alan Umeda	Kaneohe	HI	96744	US	12/13/2018
467	Karen Kalino	Honolulu	HI	96816	US	12/13/2018
468	Walter Miske	Kapolei	HI	96707	US	12/13/2018
469	Dietra Myers Tremblay	Pearl City	HI	96782	US	12/13/2018
470	Steven Walther	Dimondale	MI	48821	US	12/13/2018
471	Nancy Manali-Leonardo	Honolulu	HI	96815	US	12/13/2018
472	Darcie Damaso	Kapolei	HI	96707	US	12/13/2018
473	Sharon Tamashiro	Honolulu	HI	96818	US	12/13/2018
474	Deborah Parker	Waimanalo	HI	96795	US	12/13/2018
475	Wendy Watanabe	Mililani	HI	96789	US	12/13/2018
476	Noela Napoleon	Honolulu	HI	96819	US	12/13/2018
477	Larry Tamashiri	Waipahu	HI	96797	US	12/13/2018
478	Jodie Paulos	Kapolei	HI	96707	US	12/13/2018

479	Aaron Wills	Honolulu	HI	96822	US	12/13/2018
480	Dolores Goulsby	N Las Vegas	NV	89032	US	12/13/2018
481	Thomas W. Beck	Honolulu	HI	96819	US	12/13/2018
482	Joaquin Almanza	Kaneohe	HI	96744	US	12/13/2018
483	Cread Mitsui Jr	Mililani	HI	96789	US	12/13/2018
484	Kahau Young	Kaneohe	HI	96744	US	12/13/2018
485	Kimberly Fonoimoana	Honolulu	HI	96818	US	12/13/2018
486	Karl Uyehara	Honolulu	HI	96826	US	12/13/2018
487	Kristen Mallari	Mililani	HI	96789	US	12/13/2018
488	Barry Kemp	Honolulu	HI	96826	US	12/13/2018
489	Chris Au	Honolulu	HI	96821	US	12/13/2018
490	Maria Gaoteote	Honolulu	HI	96818	US	12/13/2018
491	Stephanie Marquez	Ewa Beach	HI	96706	US	12/13/2018
492	Jamie Chvosta	Honolulu	HI	96819	US	12/13/2018
493	sarah martin	kapolei	HI	96707	US	12/13/2018
494	David Rezachek	Honolulu	HI	96813	US	12/13/2018
495	Lola Tangaro	Kaneohe	HI	96744	US	12/13/2018
496	Kyke Sekiya	Mililani	HI	96789	US	12/13/2018
497	Colin Watanabe	Honolulu	HI	96818	US	12/13/2018
498	Jas Green	Kailua	HI	96734	US	12/13/2018
499	Sidette Sakamaki	Honolulu	HI	96819	US	12/13/2018
500	Lynn Makabe	Pearl City	HI	96782	US	12/13/2018
501	Bj Waka	Kapolei	HI	96707	US	12/13/2018
502	Jennifer Casem	Hilo	HI	96720	US	12/13/2018
503	Leonard Fergusen	Waipahu	HI	96797	US	12/13/2018
504	Gregory Kamai	Honolulu	HI	96817	US	12/13/2018
505	Jessie Ross Navarrete	Kapolei	HI	96707	US	12/13/2018
506	Renee Winchester	Honolulu	HI	96817	US	12/13/2018
507	Kahelelani keawekane	Hilo	HI	96720	US	12/13/2018
508	Jeff Dougherty	Tustin	CA	92780	US	12/13/2018
509	Susan Young	Ewa Beach	HI	96706	US	12/13/2018
510	Lesle Starshak	Honolulu	HI	96819	US	12/13/2018
511	N A	Menifee	CA	92584	US	12/13/2018
512	Nanako Hew	Waipahu	HI	96797	US	12/13/2018
513	Craig Matsuda	Honolulu	HI	96825	US	12/13/2018
514	Ortiz Ivy	Waipahu	HI	96797	US	12/13/2018
515	Maile Emery	Kapolei	HI	96707	US	12/13/2018
516	Simon Warguleski	Honolulu	HI	96825	US	12/13/2018
517	Kaimiloa Chandler	Pearl City	HI	96782	US	12/13/2018
518	Jerome Romano	Honolulu	HI	96813	US	12/13/2018

519	Celia pang	Honolulu	HI	96813	US	12/13/2018
520	Errol Paikai jr	Waipahu	HI	96797	US	12/13/2018
521	Linda Ishihara	Honolulu	HI	96817	US	12/13/2018
522	sarah d'yal freistat	Wailuku	HI	96793	US	12/13/2018
523	Deanna Adams	Honolulu	HI		US	12/13/2018
524	Sara Perry	Waianae	HI	96792	US	12/13/2018
525	Jay Lum	Honolulu	HI	96817	US	12/13/2018
526	Jody Mesiona	Millilani	HI	96789	US	12/13/2018
527	Jonay Wiley	Kahului	HI	96732	US	12/13/2018
528	Ruth Ann Buttel	Hauula	HI	96717	US	12/13/2018
529	Calvin Torres	Kaneohe	HI	96744	US	12/13/2018
530	Ross Borges	Millilani	HI	96789	US	12/13/2018
531	Amy Omalza	Whitmore Village		96786	US	12/13/2018
532	Rick Davis	Hilo	HI	96720	US	12/13/2018
533	scott yang	Honolulu	HI	96826	US	12/13/2018
534	Ricky Mericle	Ewa Beach	HI	96706	US	12/13/2018
535	Kelley Streadbeck	Honolulu	HI	96825	US	12/13/2018
536	Carissa Julian	Kapolei	HI	96707	US	12/13/2018
537	Bonita Brady	Ewa Beach	HI	96706	US	12/13/2018
538	Alan Lu	Honolulu	HI	96818	US	12/13/2018
539	Franchot Termeteet	Ewa Beach	HI	96706	US	12/13/2018
540	Helen Waa	Hauula	HI	96717	US	12/13/2018
541	Carrie Sha	Millilani	HI	96789	US	12/13/2018
542	Henry Pang	Honolulu	HI	96817	US	12/13/2018
543	Desiree Haina	Waianae	HI	96792	US	12/13/2018
544	Francis Aguisanda	Waipahu	HI	96797	US	12/13/2018
545	Julie Walters	Waianae	HI	96792	US	12/13/2018
546	Michael Wong				US	12/13/2018
547	Anna Arita	Waipahu	HI	96797	US	12/13/2018
548	Marjorie Perez	KAPOLEI	HI	96707	US	12/13/2018
549	Kenny Quon	Honolulu	HI	96813	US	12/13/2018
550	Grace Bright	Kapolei	HI	96707	US	12/13/2018
551	Patricia Mau	Kaneohe	HI	96744	US	12/13/2018
552	Meleana Toilolo-koa	Waipahu	HI	96797	US	12/13/2018
553	Waynell Goodman	Waianae	HI	96792	US	12/13/2018
554	SYLVIE DEBENEY			92100	France	12/13/2018
555	Wilson Guntang	Waipahu	HI	96797	US	12/13/2018
556	Fay Morinaga-Pang	Kaneohe	HI			12/13/2018
557	krissy kanani mokiao-lee	kailua	HI	96734	US	12/13/2018
558	James Edmondson	Kaneohe	HI	96744	US	12/13/2018

96744-5916

559	Shannon White	Honolulu	HI	96817	US	12/13/2018
560	Michelle Rocca	Honolulu	HI	96817	US	12/13/2018
561	Charles Stephens	Ewa Beach	HI	96706	US	12/13/2018
562	Kelly Nakano	Honolulu	HI	96822	US	12/13/2018
563	Robert Ortiz	San Francisco	CA	94945	US	12/13/2018
564	Stephanie Toyama	Honolulu	HI	96813	US	12/13/2018
565	Raj Bose	Honolulu	HI	96828	US	12/13/2018
566	J S	Milliani	HI	96789	US	12/13/2018
567	Paul Deramos	Honolulu	HI	96816	US	12/13/2018
568	Keala Ohia	Milliani	HI	96789	US	12/13/2018
569	Myra Miura	Waianae	HI	96792	US	12/13/2018
570	Jorge Monteallegre	Honolulu	HI	96816	US	12/13/2018
571	Jason Akamine	La Habra	CA	90633	US	12/13/2018
572	Trebor Kang	Dimondale	MI	48821	US	12/13/2018
573	Travic Uesugi	Wahiawa	HI	96786	US	12/13/2018
574	Daniel Sataua-young	Waipahu	HI	96794	US	12/13/2018
575	Tatiana Chancheck	Waianae	HI	96792	US	12/13/2018
576	Pat Okouchi	Waipahu	HI	96797	US	12/13/2018
577	Darrell Pili	Honolulu	HI	96818	US	12/13/2018
578	Susan Hughes	Binghamton	NY	13905	US	12/13/2018
579	Thomas Spellman	Dublin	CA	96706	Ireland	12/13/2018
580	Rhonda Padilla Oliva	San Jose	CA	95112	US	12/13/2018
581	Annabel Covington	Rock Hill	NY	29732	US	12/13/2018
582	John Savich	Binghamton	NY	13901	US	12/13/2018
583	Daren Beeman	Kaneohe	HI	96744	US	12/13/2018
584	Vaneissa Ducosin	Hilo	HI	96720	US	12/13/2018
585	Jill Power-Cross	Newaygo	MI	49337	US	12/13/2018
586	Nikhia Richmond	Oxford		34484	US	12/13/2018
587	Alexis Quiroz	Wayne		19087	US	12/13/2018
588	Mary McAndrew	Honolulu	HI	96822	US	12/13/2018
589	Tyler Cordoni	Denver	CO	80230	US	12/13/2018
590	Judith Bobalik	Hammond	IN	46325	US	12/13/2018
591	Lisa Dau	Milliani	HI	96789	US	12/13/2018
592	Luis Rivas	Kihei	HI	96753	US	12/13/2018
593	Nick Kuhio	Aiea	HI	96701	US	12/13/2018
594	John Smith	Kapolei	HI	96707	US	12/13/2018
595	Dancette Iuli	Kaiserslautern		67663	Germany	12/13/2018
596	Jason Smith	Aiea	HI	96701	US	12/13/2018
597	Brian Sharkey	Honolulu	HI	96822	US	12/13/2018
598	Barney Wagner	Honolulu	HI	96819	US	12/13/2018

599	David Mark Larsen Larsen	Honolulu	HI	96826	US	12/13/2018
600	Donald Duck	Honolulu	HI	96813	US	12/13/2018
601	Kristine Chung	Kaneohe	HI	96744	US	12/13/2018
602	Ariane Ross	Ewa beach	HI	96706	US	12/13/2018
603	Brian Look	Honolulu	HI	96817	US	12/13/2018
604	Gavin Ching	Honolulu	HI	96826	US	12/13/2018
605	James Mcbrayer	Ewa Beach	HI	96706	US	12/13/2018
606	Frank Lucero	Waipahu	HI	96797	US	12/13/2018
607	Carl Carney	Kaneohe	HI	96744	US	12/13/2018
608	Dennis McPhee	Honolulu	HI	96816	US	12/13/2018
609	Emmett Kaanehe	Wailuku	HI	96793	US	12/13/2018
610	Darrell Schuetz	Waipahu	HI	96797	US	12/13/2018
611	Justin parker	mililani	HI	96789	US	12/13/2018
612	Kylee Malo	Honolulu	HI	96813	US	12/13/2018
613	Donald Denison	Waianae	HI	96792	US	12/13/2018
614	Marc Mali	San Carlos	HI	94070	US	12/13/2018
615	Laverne Grace				US	12/13/2018
616	chester kau	Honolulu	HI	96815	US	12/13/2018
617	brandee sakai	Honolulu	HI	96821	US	12/13/2018
618	Michael Rice	Waianae	HI	96792	US	12/13/2018
619	Lianne Hee	Waianae	HI	96792	US	12/13/2018
620	Elizabeth Dunlop	kula	HI	96790	US	12/13/2018
621	James Tio	WAIANAE	HI	96792	US	12/13/2018
622	sheyna-marie chang	Wailuku	HI	96793	US	12/13/2018
623	Charmaine Ross	Honolulu	HI	96813	US	12/13/2018
624	Vance Hoe	Kahului	HI	96732	US	12/13/2018
625	Jeremiah Chapman	Olive Branch		38654	US	12/13/2018
626	Luella Lake	Honolulu	HI	96818	US	12/13/2018
627	Cassandra Crawford	Honolulu	HI	96814	US	12/13/2018
628	William Naeole Jr	Aiea	HI	96701	US	12/13/2018
629	Sarah Phillips	Atlanta		30301	US	12/13/2018
630	Jake Hanawahine	Kailua	HI	96734	US	12/13/2018
631	Brenda Choi	Los Angeles	CA	90009	US	12/13/2018
632	Michelle Nakagawa	Kaneohe	HI	96744	US	12/13/2018
633	Lucy Oka	Waipahu	HI	96797	US	12/13/2018
634	Stephen Nakasone	Waipahu	HI	96797	US	12/13/2018
635	Melandrewn Taban	Kunia	HI	96759	US	12/13/2018
636	Jason Pierce	Kailua	HI	96734	US	12/13/2018
637	K Saul	Ewa Beach	HI	96706	US	12/13/2018
638	Kapua Phillips	Honolulu	HI	96805	US	12/13/2018

639	Gerard K Puana Puana	Honolulu	HI	96818	US	12/13/2018
640	JOHN BYERS	Honolulu	HI	96819	US	12/13/2018
641	william Kernstock	Honolulu	HI	96826	US	12/13/2018
642	Carlos Ramirez	Ewa Beach	HI	96706	US	12/13/2018
643	Spencer Fong	Honolulu	HI	96813	US	12/13/2018
644	Kaimanu Takayama				US	12/13/2018
645	Bradley Beach	Mchenry		60050	US	12/13/2018
646	Samantha Santos	Kailua	HI	96734	US	12/13/2018
647	Cate Adlam	Mission			Canada	12/13/2018
648	Susanna Ho	Honolulu	HI	96805	US	12/13/2018
649	Gannon Goo	Honolulu	HI	96817	US	12/13/2018
650	Diane Suga	Waipahu	HI	96797	US	12/14/2018
651	Alvin Church	Waipahu	HI	96797	US	12/14/2018
652	Kim Murphy	Honolulu	HI	96816	US	12/14/2018
653	Alan Rivers	Las Vegas	NV	89085	US	12/14/2018
654	Brent Sipes	Honolulu	HI	96817	US	12/14/2018
655	Nathan Chong	La Habra	CA	90633	US	12/14/2018
656	Brian Davis	The Colony	TX	75056	US	12/14/2018
657	Dean Kahalewai	Mililani	HI	96789	US	12/14/2018
658	Kathleen Blackwell	Vallejo	CA	94591	US	12/14/2018
659	MILTON KUBO	Warren	HI	48089	US	12/14/2018
660	Heather Tom	Honolulu	HI	96818	US	12/14/2018
661	Darin Kobayashi	Honolulu	HI	96818	US	12/14/2018
662	JJ PP	Danville	CA	94526	US	12/14/2018
663	Steve Liu	Seattle	WA	98122	US	12/14/2018
664	Steven Kitsu	Kapolei	HI	96707	US	12/14/2018
665	Jerinette Waiolama	Waimanalo	HI	96795	US	12/14/2018
666	Jeffrey Yamane	Mililani	HI	96789	US	12/14/2018
667	Peter Hirai	Honolulu	HI	96813	US	12/14/2018
668	David Bunnell	Honolulu	HI	96821	US	12/14/2018
669	Olaf-Lee Tollefsen	Honolulu	HI	96813	US	12/14/2018
670	Rene Chinen	Kaneohe	HI	96744	US	12/14/2018
671	Matthew Potter	Robbins		37852	US	12/14/2018
672	Terry Dana	Honolulu, HI	HI	96792	US	12/14/2018
673	Jose Blas	Pearl City	HI	96782	US	12/14/2018
674	Kalani Low	Kahului	HI	96732	US	12/14/2018
675	Christine Eickstead	Kapolei	HI	96707	US	12/14/2018
676	Valerie Rands	Pearl city	HI	96782	US	12/14/2018
677	Christina Aguilar	Waipahu	HI	96797	US	12/14/2018
678	Lisa M Morrissey	Honolulu	HI	96813	US	12/14/2018



679	Victoria Ramones	Honolulu	HI	96822	US	12/14/2018
680	Gary Lloyd	Honolulu	HI	96813	US	12/14/2018
681	Gary Danley	Ewa Beach	HI	96706	US	12/14/2018
682	Lil Naki	Waianae	HI	96792	US	12/14/2018
683	Shaun Dydasco	Kaneohe	HI	96744	US	12/14/2018
684	Marie-Claude Wacke r Gallivan	Sioux Falls	SD	57106	US	12/14/2018
685	Brandy Briggs	Nuuanu	HI	96817	US	12/14/2018
686	Victor Ching	Honolulu	HI	96819	US	12/14/2018
687	Keith Lum	Ewa Beach	HI	96706	US	12/14/2018
688	Jenelle Arenas	Honolulu	HI	96814	US	12/14/2018
689	Mark Want	Honolulu	HI	96825	US	12/14/2018
690	Bryan Murgio	Kapolei	HI	96707	US	12/14/2018
691	Stephen Laudig	Honolulu	HI	96826	US	12/14/2018
692	Padua-cintron Enrique	Waianae	HI	96792	US	12/14/2018
693	STEVEN DEPAOLI	Waimanalo	HI	96795	US	12/14/2018
694	chris kimball	Hawi	HI	96719	US	12/14/2018
695	kailon moomau	Lincoln		68502	US	12/14/2018
696	Nikos Leverenz	Honolulu	HI	96817	US	12/14/2018
697	Susan Chon	Waipahu	HI	96797	US	12/14/2018
698	Causha Spellman	Aiea	HI	96701	US	12/14/2018
699	Darren Gionson	Waianae	HI	96792	US	12/14/2018
700	Michael Golojuch Jr	Kapolei	HI	96707	US	12/14/2018
701	William Edwards	Pearl City	HI	96782	US	12/14/2018
702	Bernard W. Young Young	San Francisco	HI	94124	US	12/14/2018
703	Kenny Kinoshita	Pauoa	HI	96813	US	12/14/2018
704	Shirley Fisher-Armster				US	12/14/2018
705	Elijah Kinney	Lawton		73507	US	12/14/2018
706	Vivian Sommer	Dripping Springs		78620	US	12/14/2018
707	Hunter Smith	Kansas City		64121	US	12/14/2018
708	Nancy Villalon	Pearl City		96782	US	12/14/2018
709	Brian 2	Hopkinton		1748	US	12/14/2018
710	Dane Gonsalves	Honolulu	HI	96813	US	12/14/2018
711	Elvina Lopes	Honolulu	HI	96817	US	12/14/2018
712	Hassan El-Amin	Van Nuys		91405	US	12/14/2018
713	Joseph Briggs	Honolulu	HI	96826	US	12/14/2018
714	Zoe Watch	Portland		97267	US	12/14/2018
715	Susie Raymond	Kahului	HI	96732	US	12/15/2018
716	Larry Tang	Pearl City	HI	96782	US	12/15/2018
717	Joseph Andrade	Hilo	HI	96720	US	12/15/2018
718	Teddy McCracken	Blacksburg	VA	24060	US	12/15/2018

719	Patrick Mori	Honolulu	HI	96813	US	12/15/2018
720	Munawar Khan	Milliani	HI	96789	US	12/15/2018
721	Branden Martin	Catlett		20119	US	12/15/2018
722	Kwabena Turner	Los Angeles		90016	US	12/15/2018
723	CURTIS NK CRABBE	HOOLEHUA	HI	96729	US	12/15/2018
724	Kayla Barros	Kailua	HI	96734	US	12/15/2018
725	Thendara Hyder	Norwich		13815	US	12/15/2018
726	Jacqueline Gomez	Las Vegas		89108	US	12/15/2018
727	DeMarlo Whetstone	Arlington		76006	US	12/15/2018
728	Shane Kincaid	Kapolei	HI	96707	US	12/15/2018
729	Richard Godfrey	Hilo	HI	96720	US	12/15/2018
730	Shannon Enns	Lahaina	HI	96761	US	12/15/2018
731	Walter McCracken	Waipahu	HI	96797	US	12/15/2018
732	Kealii Pang	Honolulu	HI	96816	US	12/15/2018
733	Justin Bruhn	Waianae	HI	96792	US	12/15/2018
734	Gary Morio	Honolulu	HI	96825	US	12/15/2018
735	Mapuana De Jesus	Hilo	HI	96720	US	12/15/2018
736	Kevin Wiggins	Buffalo		14204	US	12/15/2018
737	John Bautista	Kaneohe	CA	96744	US	12/15/2018
738	Steven Lee	Honolulu	HI	96817	US	12/15/2018
739	Alex Karrow	Downers Grove		60515	US	12/15/2018
740	Andy Kumamoto	Honolulu		96825	US	12/15/2018
741	Mark Inciong	Kailua	HI	96734	US	12/15/2018
742	David Kahui	Honolulu	HI	96817	US	12/15/2018
743	Kiley Hiyakumoto	Honolulu	HI	96826	US	12/15/2018
744	Adrienne Afalava	Hauula	HI	96717	US	12/15/2018
745	Curtis Chee	Kailua	HI	96734	US	12/15/2018
746	Damon Larson	Seattle		98102	US	12/15/2018
747	Charles A Volhein Sr	Kailua	HI	96734	US	12/15/2018
748	Sandra Toliver	Wailuku	HI	96793	US	12/15/2018
749	Kamala Cockett	Hon.	CA	96744	US	12/15/2018
750	Cydnee Clyde	Honolulu	HI	96819	US	12/15/2018
751	Maxine Anderson	Honolulu	HI	96821	US	12/15/2018
752	Shane Crampton	Williamsburg		49690	US	12/15/2018
753	Danny Greer	Mesquite		75180	US	12/15/2018
754	Nancy Molette	Houston		77035	US	12/15/2018
755	CT smith	Pearl City	HI	96782	US	12/15/2018
756	Elizabeth Watts	Lynbrook		11563	US	12/15/2018
757	Peter Servon	Dover		19904	US	12/15/2018
758	Colten Hughes	Hutchinson		55350	US	12/15/2018

759	Matthew Fitzsimmons	Pearl City	HI	96782	US	12/15/2018
760	Van Sasaki	Waipahu	HI	96797	US	12/15/2018
761	Claire Lee	Honolulu	HI	96813	US	12/15/2018
762	Leonard Riley	Coosawhatchie		29912	US	12/15/2018
763	Imarai Watermann	Smyrna		30080	US	12/15/2018
764	Lashanda Crosby	Odessa		79761	US	12/15/2018
765	Tiffany Joaquin	Wahiawa	HI	96818	US	12/15/2018
766	Cynthia Perkins	Grenada		38901	US	12/15/2018
767	Michael Moses	Kailua	HI	96734	US	12/15/2018
768	Roger Overrein	Milliani	HI	96789	US	12/15/2018
769	John Hammond	Honolulu	HI	96825	US	12/15/2018
770	Wendy Arbeit	Honolulu	HI	96822	US	12/15/2018
771	Richard R. Fujita Jr.	Pearl City	HI	96782	US	12/15/2018
772	Donald Lee	Kaneohe	HI	96744	US	12/15/2018
773	Davin Kawelo	Ewa beach	HI	96706	US	12/15/2018
774	James Auld	Aiea	HI	96701	US	12/15/2018
775	William Ching	Honolulu	HI	96824	US	12/15/2018
776	Eric Hill	Fort Myers		33967	US	12/15/2018
777	gerard arose	Laurence Harbor		ave south amboy	US	12/15/2018
778	Susan Woo	Honolulu	HI	96825	US	12/15/2018
779	Leigh-Ann Miyasato	Honolulu	HI	96816	US	12/15/2018
780	Christine Martin	Warren		48089	US	12/15/2018
781	Sheena Tangaro	Kaneohe	HI	96744	US	12/15/2018
782	Peter T	Kailua	HI	96734	US	12/15/2018
783	August Ehrlich	Appleton		54913	US	12/15/2018
784	Roy Agpaoa				Netherlands	12/15/2018
785	Dwayne Batad	Honolulu	HI	96817-2347	US	12/15/2018
786	Catherine Smith	Toronto		M4K2P2	Canada	12/15/2018
787	Cynthia Sanchez	Wilmer		75172	US	12/15/2018
788	Dianna Moore	Honolulu	HI	96817	US	12/15/2018
789	Robert Lee	Milliani	HI	96789	US	12/15/2018
790	Carmen Mitsuyasu-Gapero	Ewa Beach	HI	96706	US	12/15/2018
791	HeidiAnn Caldeira	Kilauea	HI	96754	US	12/15/2018
792	Eve-Marie Ceryanek	Hubbardston	MA	1452	US	12/15/2018
793	Jonathan Valdriz	Aiea	HI	96701	US	12/15/2018
794	Lilinoe M?lama	Honolulu	HI	96819	US	12/15/2018
795	William Bailey	Hayward	CA	94544	US	12/15/2018
796	Darrell Olivier	Chicago		60602	US	12/15/2018
797	Jared Watumull	Honolulu	HI	96816	US	12/15/2018
798	David Ray	Ewa Beach	HI	96706	US	12/15/2018

799	Jessica Brown	Council Bluffs	51501	US	12/15/2018
800	kara obana	Honolulu	96822	US	12/16/2018
801	Frederick Parker	Mililani	96789	US	12/16/2018
802	Xareth Ishihara	Pearl City	96782	US	12/16/2018
803	Frank Black	Pawtucket	2860	US	12/16/2018
804	dan krajack	paonia	81428	US	12/16/2018
805	James Langston	Honolulu	96822	US	12/16/2018
806	Michael H Uehara	Honolulu	96818	US	12/16/2018
807	Daral Fujio	Wahiawa	96786	US	12/16/2018
808	Jane Ane	Kailua Kona	96740	US	12/16/2018
809	Han Song	Honolulu	96813	US	12/16/2018
810	Kathy Shimata	Honolulu	96822	US	12/16/2018
811	Gary Li	Honolulu	96826	US	12/16/2018
812	Biang Detor	Waipahu	96797	US	12/16/2018
813	Ken Serious	Honolulu	96822	US	12/16/2018
814	Dorin McKeague	Kapolei	96707	US	12/16/2018
815	Brian Ellison	Atlanta	30311	US	12/16/2018
816	Kimberly Nahaku	Pearl City	96782	US	12/16/2018
817	Tia Christensen	Oceanside	92056	US	12/16/2018
818	Kurt Boyack	Oceanside	92056	US	12/16/2018
819	Allen Robinson	Kaneohe	96745	US	12/16/2018
820	Glory Abad	Kapolei	96707	US	12/16/2018
821	Dayna Teves	Kaneohe	96744	US	12/16/2018
822	Stephan Buck	Kailua	96734	US	12/16/2018
823	Victoria Teves	Waipahu	96797	US	12/16/2018
824	TeHani Jones	Aiea	96701	US	12/17/2018
825	John Totten	Kailua-kona	96745	US	12/17/2018
826	Susan Morton	Honolulu	96825	US	12/17/2018
827	Charles Shank	Kailua	96734	US	12/17/2018
828	John Baker	Dimondale	48821	US	12/17/2018
829	Patricia Warford	Ewa Beach	96706	US	12/17/2018
830	Gillian Desmond	Honolulu	96825	US	12/17/2018
831	Jim Long III	Honolulu	96817	US	12/17/2018
832	Katherine Pihō	Waianae	96792	US	12/17/2018
833	Scott Kawahara	Aiea	96701	US	12/17/2018
834	Nathaniel Burnham	Harpurville	13787	US	12/17/2018
835	Joy Johnston	Kaneohe	96744	US	12/17/2018
836	Mark White	Waipahu	96797	US	12/17/2018
837	shalomar silva	Aiea	96701	US	12/17/2018
838	Lester Yoshimura	Mililani	96789	US	12/17/2018

839	K Chng	Honolulu	HI	96826	US	12/17/2018
840	Jane Yoshimura	MILILANI	HI	96789	US	12/17/2018
841	Daniel O'Leary	Honolulu	HI	96815	US	12/17/2018
842	Andrew Andrew	Mililani	HI	96789	US	12/17/2018
843	Wendell Hong	Waianae	HI	96792	US	12/17/2018
844	Bernard Chong	Honolulu	HI	96813	US	12/17/2018
845	Christopher Mann	Mililani	HI	96789	US	12/17/2018
846	Leomar Aparra	Pearlcity	HI	96782	US	12/17/2018
847	Jackie C	Makawao	HI	96768	US	12/17/2018
848	Audrey Villanueva	Wailuku	HI	96793	US	12/17/2018
849	Tracy Shields	Kailua		95747	US	12/17/2018
850	Norman Bradley	Waianae	HI	96792	US	12/17/2018
851	Mary Kawasaki	Honolulu	HI	96817	US	12/18/2018
852	James C Bradley	HONOLULU	HI	96815	US	12/18/2018
853	Chihara Mark	Honolulu	HI	96825	US	12/18/2018
854	Kawai Idian	Waipahu	HI	96797	US	12/18/2018
855	Michele Golojuch	Kapolei	HI	96707	US	12/18/2018
856	Michael Shuman	Aiea	HI	96701	US	12/18/2018
857	Daniel Iha				US	12/18/2018
858	Lee Miyashiro	Honolulu	HI	96816	US	12/18/2018
859	Bill Hanrahan	Honolulu	HI	96816	US	12/18/2018
860	Aubrey Hawk	Honolulu	HI	96822	US	12/18/2018
861	tenzin langdor	manali		175131	US	12/18/2018





349 have signed. Let's get to 1,000!



Tracy Yoshimura started this petition to State of Hawaii Court System

#### Problem

#### PETITION TO IMPEACH CITY AND COUNTY OF HONOLULU'S PROSECUTOR KEITH KANESHIRO

Shall City and County of Honolulu Prosecutor Keith M. Kaneshiro be impeached and removed from his position for malfeasance, misfeasance or non-feasance in office? Specifically, did Keith M. Kaneshiro commit malfeasance or misfeasance by failing to take timely and appropriate action pertaining to three of his employees, namely:

- 1) Former Deputy Prosecutor Katherine Kealoha, when it was widely known that the FBI and the United States Justice Department were actively investigating potential criminal acts she was suspected of committing and or had participated in. Prosecutor Kaneshiro failed to take reasonable or necessary "administrative" actions to protect the integrity of any or all, past and present prosecutions that she either had, or was currently participating in or supervising. His failure to take immediate administrative measures to avoid compromising the status of all legal matters she had or was associated with, poses a severe public safety issue, since "if" she is convicted, any and every case she has ever participated in, or supervised, could be challenged on the grounds of her questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom she may have supervised or worked with.
- 2) Deputy Prosecuting Attorney Chasid Sapolu, since it has been made known via a "Subject Letter" from the Special U.S. Attorney of the United States Department of Justice, that Deputy Prosecutor Chasid Sapolu is the "subject" of a federal grand jury investigation. Prosecutor Kaneshiro has again failed to take reasonable or necessary "administrative" actions to protect the integrity of any or all, past and present prosecutions that he either had, or is currently participating in or supervising. Prosecutor Kaneshiro's failure to take immediate administrative measures to protect the status of all legal matters Deputy Chasid Sapolu had or was associated with, poses a severe public safety issue; since "if" he is convicted, any and every case he has ever participated in or supervised, could be challenged on the grounds of his questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom he may have supervised or worked with.
- 3) Deputy Prosecutor Jan Futa, since it has been made known via a "Subject Letter" from the Special U.S. Attorney of the United States Department of Justice, that Deputy Prosecutor Jan Futa is the "subject" of a federal grand jury investigation. Prosecutor Kaneshiro has again failed to take reasonable or necessary "administrative" actions to protect the integrity of any or all, past and present prosecutions that she either had, or is currently participating in, or supervising. Prosecutor Kaneshiro's failure to take immediate administrative measures to protect the status of all legal matters Deputy Prosecutor Jan Futa had or was associated with, poses a severe public safety issue; since "if" convicted, any and every case she has ever participated in could be challenged on the grounds of her questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom she may have supervised or worked with.

Additionally, it has been confirmed that City and County of Honolulu Prosecutor Keith M. Kaneshiro has himself received official notification via a "Target Letter" from the Special U.S. Attorney of the United States Department of Justice informing him that he is the "Target" of a federal Investigation. However, Prosecutor Kaneshiro failed to immediately notify appropriate officials of the City and County of Honolulu and/or State of Hawaii that he received this official notice, and currently chooses to remain in his position as The Prosecutor for the City and County of Honolulu, where he supervises, directs and oversees all of the cases and employees in that agency's office. By remaining in this position, Prosecutor Keith Kaneshiro has already jeopardized, and is further jeopardizing the integrity of ANY and ALL past and present criminal cases and investigations which his office has prosecuted under his supervision or employment; since "if" he is convicted, any and every case he has ever participated in or supervised, could be challenged on the grounds of his questionable integrity, lack of credibility, and/or any possible improper influence or directions involving other prosecuting attorneys and staff members in the Prosecutors Office whom he may have supervised or worked with.

The situations involving the above-named individuals and others, could potentially lead to countless criminal cases being dismissed or overturned, setting dangerous and/or violent criminals free to roam our streets and neighborhoods, creating a tremendous public safety issue, which would threaten the safety and wellbeing of everyone living in the State of Hawaii and elsewhere.

## EXHIBIT 2

## Solution

Remove City Prosecutor from Office

### Personal story

I have had my life as well as my family's life destroyed as a result of this prosecutor and various members of his staff's malicious and corrupt actions. This impeachment is necessary to preserve the integrity of any and all cases that have been handled during Prosecutor Kaneshiro's tenure, because his credibility and integrity will become an issue that can possibly lead to cases being dismissed, and also cases that have already resulted in convictions and criminals being sent to prison, could have those decisions/convictions overturned, and result in dangerous criminal to be released from prison and endanger the citizens of Hawaii and elsewhere. This can lead to the incredibly expensive process of appeals and re-trials taking place at the taxpayer's expense.

### Start a petition of your own

This petition starter stood up and took action. Will you do the same?

[Start a petition](#)

[Start a petition of your own](#)

[This petition starter stood up and took action. Will you do the same?](#)

## Updates

1. [We are almost to 1000 signatures! Keep it coming!](#)

[Kaneshiro continues too refuse to step down! We are reaching 1000 signatures! We are at 850! Please get us to 1000 signatures. Must be a registered voter!! Mahalo](#)

[We are almost to 1000 signatures! Keep it coming!](#)

[Kaneshiro continues too refuse to step down! We are reaching 1000 signatures! We are at 850! Please get us to 1000 signature...](#)

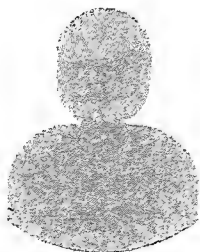


[Tracy Yoshimura](#)

[12 hours ago](#)

2. [3 days ago](#)  
750 supporters
3. [6 days ago](#)  
Tracy Yoshimura started this petition

## Reasons for signing



[Noela Napoleon](#) [5 days ago](#)

[I signed because the Prosecutor's office has made egregious mistakes which have allowed murders \(including a federal agent\) to go free.](#)

- 
- 11

[Share](#)

[Tweet](#)





## Facing federal probe, city prosecutor rejects calls to step aside, says his office runs 'effectively'



Keith Kaneshiro responds to questions regarding federal investigation into the Prosecutor's office

By Lynn Kawano | December 17, 2018 at 12:35 PM HST - Updated December 17 at 11:19 PM



# EXHIBIT 3

Facing federal probe, city prosecutor rejects calls to step aside, says his office runs 'effectively'

HONOLULU (HawaiiNewsNow) - For the first time Monday, embattled city Prosecutor Keith Kaneshiro responded to growing calls to step aside, saying that he was elected for four years and that his office is being run effectively.

Kaneshiro has received a target letter from the U.S. Department of Justice amid a widening public corruption probe, which has already netted lengthy indictments against ex-Police Chief Louis Kealoha and his wife, a former top-ranking deputy in Kaneshiro's office. Both have multiple federal trials scheduled for next year.

Four other police officers were also arrested in connection with the case and their trials are set for March.

On Monday, Hawaii News Now caught up with Kaneshiro as he left a budget meeting at city hall.

He has repeatedly ignored requests for comment and didn't answer most of the questions posed to him Monday.

But when asked about calls for him to step aside, Kaneshiro said that he had been elected for four years, an apparent indication that he intends to serve out his term if he's able.

He did not comment on efforts underway to impeach him, and was indignant when asked whether continuing to serve in his position was bad for the public and Honolulu's law enforcement community.

*[Also read: City prosecutor shows no signs of stepping aside after getting formal notice that he's a target of federal probe]*

*[Also read: Campaign to impeach city prosecutor launched as he shows no signs of stepping aside amid federal probe]*

"I was elected to serve for four years," he said.

"I think it's bad for the public when you folks go on harassing me. Our office is operating. Do you have any evidence that it's not effective? It's effective."

Kaneshiro's former second-in-command, first Deputy Chasid Sapolu, took a leave of absence last week after confirming what Hawaii News Now reported — that he received a subject letter also from Justice Department.



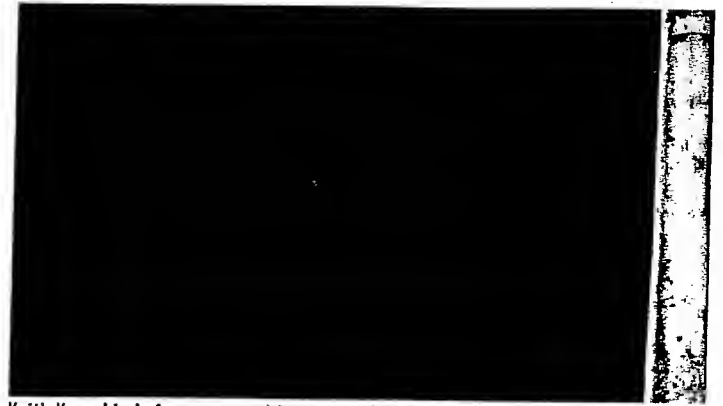
Keith Kaneshiro has named Dwight Nadamoto as his acting first deputy.

Kaneshiro has named Dwight Nadamoto as his acting first deputy.

It's a move that indicates Sapolu may not be welcomed back as a result of his stepping down.

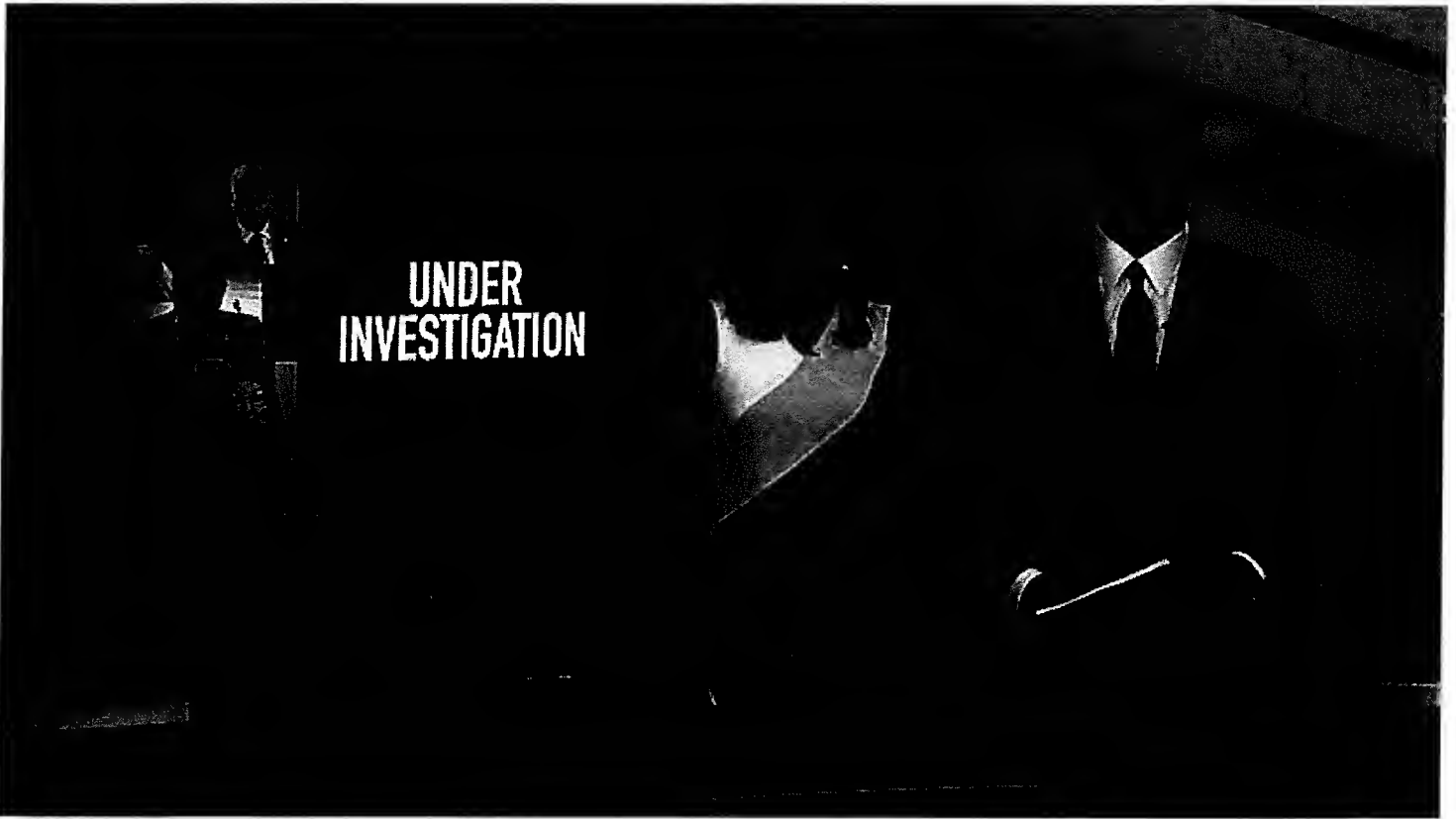
Sapolu was praised for the move by others in the legal community, who have been calling for Kaneshiro to also step aside while federal investigators continue their work.

Copyright 2018 Hawaii News Now. All rights reserved.



Keith Kaneshiro's former second-in-command, first Deputy Chasid Sapolu, took a leave of absence last week after confirming what Hawaii News Now reported — that he received a subject letter also from Justice Department. (Image: Hawaii News Now)

## City prosecutor shows no signs of stepping aside after getting formal notice that he's a target of federal probe



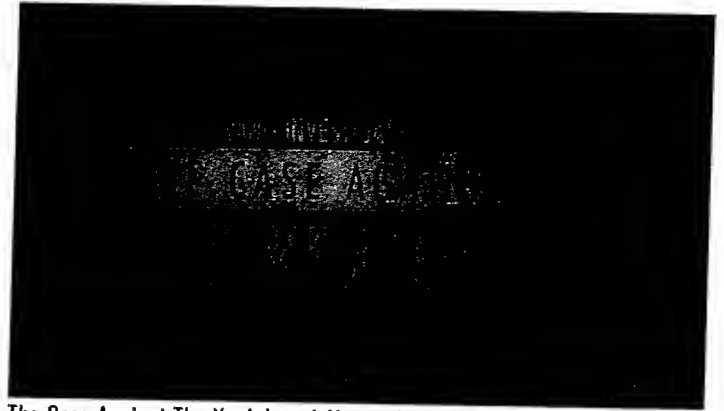
City prosecutor shows no signs of stepping aside after getting formal notice that he's a target of f

By **HNN Staff** | December 10, 2018 at 9:25 AM HST - Updated December 11 at 6:30 AM

HONOLULU (HawaiiNewsNow) - City Prosecutor Keith Kaneshiro has received a Justice Department target letter informing him that he's under investigation in the federal public corruption probe that has already led to two indictments against his former top deputy, Katherine Kealoha.

Former U.S. Attorney and Honolulu prosecutor Loretta Sheehan says the development is sure to rattle the law enforcement community.

“Target letter means the grand jury has substantial evidence that you’ve engaged in criminal activity. You are going to be indicted,” Sheehan said. “A subject letter you have the opportunity to possibly not be indicted to possibly cooperate or to plead to a much lesser charge. Or if you’re completely innocent, to clear up any misunderstanding.”



The Case Against The Kealohas: A Hawaii News Now Special Report

Two other leading deputies, Chasid Sapolu and Janice Futa, have received Justice Department subject — but not target — letters.

Special federal prosecutor Michael Wheat is leading the public corruption probe.

His office sent target letters to ex-Honolulu Police Chief Louis Kealoha and other police officers in 2016, and all were immediately put on administrative leave. Months later, indictments came down on all of them.

Kaneshiro’s office appears to be connected to those cases, which are set to go to trial next year.

Kaneshiro is accused of lying to protect Louis Kealoha’s wife, Katherine, a former deputy city prosecutor.

Despite the new developments, Kaneshiro does not show signs of stepping down. And Mayor Kirk Caldwell told Hawaii News Now that the prosecuting attorney is elected and therefore he will not intervene.

***[Also read: As part of widening corruption probe, DOJ sends subject letter to second-in-command at prosecutor’s office]***

Meanwhile, the state Attorney General’s Office said on the issue that “when compelling circumstances exist, the attorney general may supersede the county prosecutor.”

The office also said it is in contact with the city Prosecutor’s Office.



City prosecutor gets target letter amid widening federal public corruption probe

Kaneshiro could be removed by voters in a recall or by the courts in an impeachment case, which would require a petition from voters.



---

“It’s gonna come from the judicial branch or the people themselves.”

Other experts say that if Kaneshiro is indicted, a judge could require he take leave from office as a condition of his pretrial release.

But Sheehan said members of law enforcement must live up to a high standard.

“When a law enforcement officer gets a target letter, of course of course he should step down of course,” she said. “There’s a cloud over your performance at this point in time, step down.”

The federal probe into Kaneshiro apparently began when investigators learned that Katherine Kealoha allegedly convinced a judge to dismiss a speeding ticket against an electrician who was working for her.

Kaneshiro, Futa and Sapolu were called before a federal grand jury repeatedly on suspicion that they tried to cover up for Kealoha.





appeal. Such appeal shall be taken within ten days after service of the board's order by filing notice of appeal with the clerk of the supreme court of the state and serving a copy thereof upon the board stating the grounds therefor.

**Section 7-119. Applicability of Charter Provisions –**

Except as otherwise provided, no provision of this charter, other than those set forth in this article of the charter, shall be applicable to the department.

**ARTICLE VIII -  
PROSECUTING ATTORNEY**

**Section 8-101. Organization –**

There shall be a department of the prosecuting attorney headed by a prosecuting attorney.

*(Reso. 78-279)*

**Section 8-102. Term of Office –**

The term of office of the prosecuting attorney shall commence at twelve o'clock meridian on the second day of January following the prosecuting attorney's election.  
*(Reso. 78-279, 83-357 and 86-238; 1992 General Election Charter Amendment Question No. 4)*

**Section 8-103. Prosecuting Attorney, Qualifications –**

The prosecuting attorney shall be a duly registered voter of the city, an attorney licensed to practice and in good standing before the supreme court of the state, who shall have engaged in the practice of law for at least five years, and who shall have been actively involved in criminal cases for at least three years within ten years next preceding the prosecuting attorney's election.

*(Reso. 78-279 and 83-357; 1992 General Election Charter Amendment Question No. 32A(12))*

**Section 8-104. Powers, Duties and Functions –**

1. The prosecuting attorney shall:
  - (a) Attend all courts in the city and conduct, on behalf of the people, all prosecutions therein for offenses against the laws of the state and the ordinances and rules and regulations of the city.
  - (b) Prosecute offenses against the laws of the state under the authority of the attorney general of the state.

- (c) Appear in every criminal case where there is a change of venue from the courts in the city and prosecute the same in any jurisdiction to which the same is changed or removed. The expense of such proceeding shall be paid by the city.
  - (d) Institute proceedings before the district judges for the arrest of persons charged with or reasonably suspected of public offenses, when the prosecuting attorney has information that any such offenses have been committed, and for that purpose, take charge of criminal cases before the district judges either in person or by a deputy or by such other prosecuting officer or in such other manner as the prosecuting attorney shall designate with approval of the district court or in accordance with statute; draw all indictments and attend before and give advice to the grand jury whenever cases are presented to it for its consideration; and investigate all matters which may properly come before the prosecuting attorney. Nothing herein contained shall prevent the conduct of proceedings by private counsel before courts of record under the direction of the prosecuting attorney.
2. The prosecuting attorney may:
- (a) Research, evaluate, and make recommendations regarding crime, crime prevention, and the criminal justice system to the governor, the legislature, the judiciary, the council, the mayor, the Honolulu police department and other criminal justice agencies, or the general public, as the prosecuting attorney deems appropriate.
  - (b) Provide crime prevention training programs for law enforcement agencies, citizens, businesses, and civic groups.
  - (c) Develop public education programs through various broadcast or print media, to provide the general public information that will assist citizens in developing the knowledge and confidence to prevent crime and to avoid being victims of crime.
  - (d) Receive and expend financial grants, donations and other funds as permitted by the provisions of the revised charter, city ordinances and applicable city, state, and federal financial and budget policies for crime research, prevention, and education.
- (Reso. 78-279, 83-357, 84-197 and 07-223)*

#### **Section 8-105. Staff –**

1. The prosecuting attorney may appoint deputies, administrative or executive assistants, and other necessary staff, including investigators who shall have all the powers and privileges of a police officer of the city.

2. At the request of the prosecuting attorney, one or more officers of the police department may be detailed by the chief of police for the purpose of doing necessary investigative work, and such police officers shall continue to serve on such a detail during the pleasure of the prosecuting attorney and as long as the necessity of such detail exists.

3. The deputy who is designated as first deputy shall, during the temporary absence or disability of the prosecuting attorney, assume the power and perform the duties of the prosecuting attorney.

*(Reso. 78-279 and 84-197; 1992 General Election Charter Amendment Question No. 12)*

#### **Section 8-106. Vacancy in Office –**

A vacancy in the office of the prosecuting attorney caused by death, resignation, removal or disqualification to hold office shall be filled as follows:

- (a) If the unexpired term is for less than one year, the office of the prosecuting attorney shall be filled by the first deputy who shall act as prosecuting attorney, or if the position of first deputy is vacant or if the first deputy does not meet the minimum qualifications for prosecuting attorney, the mayor with the approval of the council shall fill the vacancy by appointment of a person with the requisite qualifications within thirty days after the occurrence of the vacancy.
- (b) If the unexpired term is for one year or more, the vacancy shall be filled by a special election to be called by the council within ten days and to be held within one hundred twenty days after the occurrence of the vacancy. The electors of the city shall then elect a successor with requisite qualifications to fill the vacancy for the remainder of the term. If any special or general election is to be held in the city after thirty days and within one hundred eighty days after the occurrence of the vacancy, then the election shall be held in conjunction with such other election. Pending the election of the prosecuting attorney, the first deputy shall act as prosecuting attorney. If the position of first deputy is vacant or if the first deputy does not meet the minimum qualifications for prosecuting attorney, the mayor, with the approval

of the council, shall fill the vacancy by appointment of a person with the requisite qualifications within thirty days after the occurrence of the vacancy. *(Reso. 78-279, 83-357 and 84-197; 1992 General Election Charter Amendment Question No. 32A(11); 2016 General Election Charter Amendment Question No. 14)*

**Section 8-107. Removal of Prosecuting Attorney –**

The prosecuting attorney may be removed by recall or impeachment as provided in Article XII of this charter.

*(Reso. 78-279, 83-357 and 84-197; 1992 General Election Charter Amendment Question No. 32A(13); cf. Question No. 15)*

## **ARTICLE IX - FINANCIAL ADMINISTRATION**

### **CHAPTER 1 - BUDGETING**

**Section 9-101. Fiscal Year –**

The fiscal year of the city shall begin on the first day of July and end on the last day of June of the succeeding year.

**Section 9-102. Preparation and Submission of the Program and Annual Budget for the Executive Branch –**

1. Not less than one hundred twenty days prior to the end of each fiscal year, the mayor shall prepare and submit to the council:

- (a) An operating and capital program and a statement of relationships between the operating and capital components for the ensuing six fiscal years for the executive branch.
- (b) An operating and capital budget and a statement of relationships between operating and capital items for the ensuing fiscal year for the executive branch.
- (c) An accompanying message and necessary proposed ordinances for the ensuing fiscal year. The proposed budget ordinances shall be in a form prescribed by law.
- (d) Such other information as may be requested by the council.

## **ARTICLE X - SPECIAL ASSESSMENT IMPROVEMENTS**

### **Section 10-101. Improvements by Special Assessments –**

Improvements by special assessment shall be as provided by law. No changes, however, shall be made by the council regarding any matter under the control of the board of water supply without the prior approval of its board.

## **ARTICLE XI - STANDARDS OF CONDUCT**

### **Section 11-101. Declaration of Policy –**

Elected and appointed officers and employees shall demonstrate by their example the highest standards of ethical conduct, to the end that the public may justifiably have trust and confidence in the integrity of government. They, as agents of public purpose, shall hold their offices or positions for the benefit of the public, shall recognize that the public interest is their primary concern, and shall faithfully discharge the duties of their offices regardless of personal considerations.

### **Section 11-102. Conflicts of Interest –**

1. No elected or appointed officer or employee shall:
  - (a) Solicit or accept any gift, directly or indirectly, whether in the form of money, loan, gratuity, favor, service, thing or promise, or in any other form, under circumstances in which it can reasonably be inferred that the gift is intended to influence the officer or employee in the performance of such person's official duties. Nothing herein shall preclude the solicitation or acceptance of lawful contributions for election campaigns.
  - (b) Disclose confidential information gained by reason of such person's office or position or use such information for the personal gain or benefit of anyone.
  - (c) Engage in any business transaction or activity or have a financial interest, direct or indirect, which is incompatible with the proper discharge of such person's official duties or which may tend to impair the independence of judgment in the performance of such person's official duties.

## ARTICLE XII - RECALL AND IMPEACHMENT

### CHAPTER 1 - RECALL OF ELECTED OFFICERS

#### **Section 12-101. Recall of the Mayor –**

The mayor may be removed by recall which shall be initiated upon petition signed by duly registered voters equal in number to at least ten percent of the total voters registered at the last regular mayoral election. Signatures from any one council district, as provided by this charter for the election of councilmembers, in excess of forty percent of the total number required on the petition shall not be counted.

*(Reso. 83-357; 1992 General Election Charter Amendment Question Nos. 15 and 32A(9))*

#### **Section 12-102. Recall of a District Councilmember –**

A district councilmember may be removed by recall which shall be initiated upon petition signed by duly registered voters of the council district equal in number to at least ten percent of the total voters registered in such councilmember's district in the last regular council election held in the district.

*(Reso. 83-357; 1992 General Election Charter Amendment Question Nos. 15 and 32A(4))*

#### **Section 12-103. Recall Petition; Recall Election –**

The recall petition shall require each signing voter's signature, address, council district, and the date of signing. Signatures on a recall petition may be on separate sheets but each sheet shall have appended to it the affidavit of the person who circulated that sheet of the petition, that to the best of the affiant's knowledge and belief the persons whose signatures appear on the sheet are duly registered voters of the city, that they signed with full knowledge of the contents of the petition, and that their residences are correctly given.

A recall petition shall be tendered in its entirety for filing with the city clerk with a transmittal letter to the city clerk. Upon filing of such petition with the city clerk, the city clerk shall examine it to determine whether it contains a sufficient number of apparently genuine signatures of registered voters. The city clerk may question the genuineness of any signature or signatures appearing on the recall petition and if the city clerk finds that any such signature or signatures are not genuine, the city clerk

shall disregard them in determining whether the petition contains a sufficient number of signatures. The city clerk shall also disregard any signature dated more than sixty days before the petition was tendered for filing. The city clerk shall eliminate any sheet of the petition which is not accompanied by the required affidavit of the person who circulated that sheet of the petition. The invalidity of any sheet of the petition shall not affect the validity of the petition if a sufficient number of signatures remains after eliminating such an invalid sheet. The city clerk shall complete the examination of the petition within twenty working days after the date of the filing with the city clerk and shall thereupon certify the petition or reject the petition.

As soon as the city clerk has certified the recall petition, the city clerk shall notify the elected officer that the examination has been completed and the petition has been certified. Upon receipt of such notice, the elected officer may resign from office and thereupon the recall proceedings shall terminate.

If the elected officer does not resign from office within ten days after notice of the certification of such petition shall have been given to such elected officer, the city clerk shall arrange a recall election. If a general or special city or state election is to be held not less than thirty days nor more than ninety days after the ten days have expired, the recall question shall be placed before the voters at such an election. Otherwise a special recall election shall be fixed for a date not earlier than thirty days nor later than ninety days after ten days have expired. The elected officer may resign at any time prior to the recall election and thereupon the election shall not be held.

The following question shall be presented to each voter in a recall: "Shall (name of elected officer) be recalled and removed from the office of (title of office)?"

If a majority of the registered voters who vote on the question at a recall election shall vote "Yes," the elected officer shall be deemed recalled and removed from office. Otherwise, the said officer shall remain in office.

No person, who has been removed from elected office or who has resigned from such an office after a recall petition directed to the said person has been filed, shall be eligible for election or appointment to any office of the city within two years after said person's removal or resignation.

No recall petition shall be filed against an elected officer within the first or the last year of the officer's term or within six months after an unsuccessful recall election against such officer.

*(Reso. 83-357; 1992 General Election Charter Amendment Question Nos. 32A(15) and 32A(16); 2006 General Election Charter Amendment Question No. 12(f); Reso. 10-64)*

**Section 12-104. Recall of the Prosecuting Attorney –**

The prosecuting attorney may be removed by recall which shall be initiated upon petition signed by registered voters equal in number to at least ten percent of the total voters registered in the last regular election of the prosecuting attorney.

Signatures from any one council district, as provided by this charter for the election of councilmembers, in excess of forty percent of the total number required on the petition shall not be counted.

*(1992 General Election Charter Amendment Question Nos. 15 and 32A(13))*

**CHAPTER 2 -  
IMPEACHMENT OF ELECTED OFFICERS**

**Section 12-201. Impeachment of the Mayor –**

The mayor may be impeached for malfeasance, misfeasance or non-feasance in office. The courts of the State of Hawaii shall have jurisdiction as provided by applicable law over any proceeding for the removal of the mayor who may be charged on any of the foregoing grounds. The charges shall be set forth in writing in a petition for impeachment signed by not less than five thousand duly registered voters of the city, and said signatures shall be necessary only for the purpose of filing the petition. The petition having once been filed, hearings shall be held on all such charges.

*(Reso. 83-357; 1992 General Election Charter Amendment Question Nos. 14 and 32A(9); Reso. 08-135)*

**Section 12-202. Impeachment of a Councilmember –**

Any councilmember may be impeached for malfeasance, misfeasance or non-feasance in office or for interference with the performance of the duties of any officer or employee in any executive agency of the city government. The courts of the State of Hawaii shall have jurisdiction as provided by applicable law over any proceeding for the removal of a councilmember who may be charged on any of the foregoing grounds. The charges shall be set forth in writing in a petition for impeachment signed by not less than one thousand duly registered voters of the council district for the removal of a councilmember, and said signatures shall be necessary only for the purpose of filing the petition. The petition having once been filed, hearings shall be held on all such charges.

*(Reso. 83-357; 1992 General Election Charter Amendment Question Nos. 14 and 32A(4); Reso. 08-135)*



**Section 12-203. Impeachment of the Prosecuting Attorney –**

The prosecuting attorney may be impeached for malfeasance, misfeasance or non-feasance in office. The courts of the State of Hawaii shall have jurisdiction as provided by applicable law over any proceeding for the removal of the prosecuting attorney who may be charged on any of the foregoing grounds. The charges shall be set forth in writing in a petition for impeachment signed by not less than five hundred duly registered voters of the city, and said signatures shall be necessary only for the purpose of filing the petition. The petition having once been filed, hearings shall be held on all such charges.

*(1992 General Election Charter Amendment Question No. 32A(13); cf. Question No. 15; Reso. 08-135)*

**ARTICLE XIII -  
GENERAL PROVISIONS**

**Section 13-101. Definitions –**

1. The term "agency" shall mean any office, department, board, commission or other governmental unit of the city, excluding the council and its offices and any commission excluded by the provisions of this charter.

2. The term "executive agency" shall mean any agency of the executive branch of the city government, excluding the board of water supply.

3. The term "employee" shall mean any person, except an officer, employed by the city or any agency thereof, but the term shall not include an independent contractor.

4. Except as otherwise provided in this charter, the term "officer" shall include the following:

(a) Members of the council, the mayor, the prosecuting attorney and the managing director.

(b) Any person appointed as administrative head of any agency of the city or as a member of any board or commission.

(c) Any person appointed by a board or commission as the administrative head of such agency.

(d) The first deputy, any other deputy, or a division chief appointed by the administrative head of any agency of the city.

(e) Deputies of the corporation counsel and the prosecuting attorney.

*(Sec. 13-101, RCH 1973; Reso. 94-67 and 96-170)*



IN THE SUPREME COURT OF THE STATE OF HAWAII

---

In the Matter of the Impeachment of  
Honolulu City Councilmember Rene Mansho

---

ORIGINAL PROCEEDING

ORDER OF DISMISSAL

(By: Levinson, Acting C.J., Ramil, and Acoba, JJ.,  
Intermediate Court of Appeals Judge Foley,  
in place of Moon, C.J., recused, and  
Circuit Court Judge Sakamoto, in place of  
Nakayama, J., recused)

Upon consideration of the record it appears that Respondent Rene Mansho has resigned from her position as a member of the Honolulu City Council and that such resignation renders this proceeding moot. Therefore,

IT IS HEREBY ORDERED that this proceeding is dismissed.

DATED: Honolulu, Hawai'i, April 26, 2002.

**EXHIBIT 5**

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

TRACY YOSHIMURA,	)	S.P. NO. _____
	)	(Other Civil Action)
Petitioner,	)	
	)	MEMORANDUM OF LAW IN
vs.	)	SUPPORT OF PETITION
	)	
KEITH M. KANESHIRO,	)	
	)	
Respondent.	)	
_____	)	

**MEMORANDUM OF LAW IN SUPPORT OF PETITION**

**I. INTRODUCTION**

This is a petition to impeach the Prosecuting Attorney of the City and County of Honolulu, Keith Kaneshiro (“Prosecutor Kaneshiro”), brought pursuant to Section 12-203 of the Honolulu City Charter (applicable provisions of the Honolulu City Charter are attached as Exhibit “4”). The Honolulu City Charter states in Section 11-101 (Exhibit 4):

Elected and appointed officers and employees shall demonstrate by their example the highest standards of ethical conduct, to the end that the public may justifiably have trust and confidence in the integrity of government. They, as agents of public purpose, shall hold their offices or positions for the benefit of the public, shall recognize that the public interest is their primary concern, and shall faithfully discharge the duties of their offices regardless of personal considerations.

Prosecutor Kaneshiro has received a target letter from the U.S. Dept. of Justice which is part of a “widening public corruption probe”. At the very least fact that he is the target of a federal investigation requires him to remove himself from office, pending the final resolution of the case. If he remains in office while the investigation continues, there will be questions about his conduct from this day forward that will certainly affect the public’s trust and confidence in the integrity of government, and he should be impeached for the reasons set forth in the petition.

## II. AUTHORITY FOR IMPEACHMENT

Section 12-203 of the Honolulu City Charter states:

The prosecuting attorney may be impeached for malfeasance, misfeasance or nonfeasance in office. The courts of the State of Hawaii shall have jurisdiction as provided by applicable law over any proceeding for the removal of the prosecuting attorney who may be charged on any of the foregoing grounds. The charges shall be set forth in writing in a petition for impeachment signed by not less than five hundred duly registered voters of the city, and said signatures shall be necessary only for the purpose of filing the petition. The petition having once been filed, hearings shall be held on all such charges.

There is nothing more in the Honolulu City Charter that outlines the procedure for impeachment.<sup>1</sup> HRS § 603-21.5(a)(4) states: “The several circuit courts shall have jurisdiction, except as otherwise expressly provided by statute, of: (4) Actions for impeachment of county officers who are subject to impeachment.”<sup>2</sup> Rule 81(b)(11) of the Hawaii Rules of Civil Procedure states: “These rules shall apply to the following proceedings except insofar as and to

---

<sup>1</sup> The impeachment criteria for public officials allowing removing for “malfeasance, misfeasance, nonfeasance” has existed in Honolulu at least since 1925. In the Hawaii Supreme Court case of *Irwin v. Cunha*, 29 Haw. 21 (1926), reconsideration denied 29 Haw. 83, the Hawaii Supreme Court was asked to rule on whether a city supervisor should be subjected to impeachment for missing several meetings of the board of supervisors. The Court noted that R. L. 1925, section 1783 read: “Any city and county officer may be removed for malfeasance, misfeasance, nonfeasance or maladministration in office. The board of supervisors shall constitute a board of impeachment for the trial of any elected officer of the city and county (except members of the board of supervisors), who may be charged with malfeasance, misfeasance, nonfeasance or maladministration in office by not less than one hundred legal voters within the city and county. Such officer shall be given an opportunity to defend himself against the same. The board of impeachment shall have power to hear and determine the charge, and if the same be sustained, to remove from office the officer so charged, and to fill the vacancy so occurring by the appointment of some qualified person to said office for the unexpired term thereof.” 29 Haw. at 22, 23. The record of the attempted impeachment of former council member Rene Mansho in 2002 shows that the petition for impeachment was first brought before the Hawaii Supreme Court and later dismissed as moot because council member Mansho resigned (See, Exhibit “5”). That petition was brought under the prior version of the Honolulu City Charter, which allowed proceedings to be brought directly to the Hawaii Supreme Court.

<sup>2</sup> Subsection (4) was added in 2008 as part of Act 107 of the 2008 Hawaii State Legislature.

the extent that they are inconsistent with specific statutes of the State or rules of court relating to such proceedings: (11) Proceedings for the impeachment of a county officer.”

Thus this petition for impeachment must be brought as a civil matter before the circuit courts for consideration.

### **III. STANDARD FOR DETERMINING IMPEACHMENT**

Having established that this petition is properly before the circuit court, the next question is what standard should this court follow. The Honolulu City Charter requires only a showing of: “malfeasance, misfeasance or non-feasance in office”. “Malfeasance”, according to Black’s Law Dictionary (BLACK’S LAW DICTIONARY 862 (5<sup>th</sup> ed.1979), states that malfeasance can mean: “wrongful conduct that affects, interrupts or interferes with the performance of official duties.” The New Hampshire Supreme Court in *Williams v. City of Dover*, 130 N.H. 527 (1988), stated that malfeasance is, more generally, “the doing of an act which ought not to be done”, citing *Quinn v. Concord*, 108 N.H. 242, 247, 233 A.2d 106, 109-110 (1967). “Misfeasance” is defined by Black’s as: “The improper performance of some act which a man may lawfully do. The improper doing of an act which a person might lawfully do.” (BLACK’S LAW DICTIONARY 862 (5<sup>th</sup> ed.1979). Nonfeasance has defined by our Hawaii Supreme Court in *Dejetley v. Kaho`ohalahala*, 122 Haw. 251, 226 P.3d 421 (2010). There the Court defined nonfeasance as respect to public officials as a substantial failure to perform a required legal duty. (122 Haw. at 257-258, citing *Lee v. Corregedore*, 83 Haw. 154, 174 n.1, 925 P.2d 324, 344 n.1 (1996). Nonfeasance implies the failure to act where a duty to act existed. 122 Haw. at 258, citing *Baccus v. Ameripride Servs., Inc.*, 145 Idaho 246, 250, 179 P.3d 309 (2008).

### **IV. ARGUMENT**

While the process may not be clear<sup>3</sup>, what is clear that based upon the Honolulu City Charter that Prosecutor Kaneshiro has a duty under the City Charter to perform: “the highest standards of ethical conduct, to the end that the public may justifiably have trust and confidence in the integrity of government.” As the city prosecutor he is responsible to act: “on behalf of the people” in “all prosecutions therein for offenses against the laws of the state and the ordinances and rules and regulations of the city.” (Section 8-104, Honolulu City Charter). Prosecutor Kaneshiro has received a target letter from the U.S. Dept. of Justice, and has two deputies that have received “subject” letters (See, Exhibit 4). At the very least the investigation creates a perception that the city prosecutor and two deputies are being investigated for public corruption. While the news coverage of these events has been replete with speculation of criminal defense attorneys and experts that the investigation creates a taint on any prosecution that these individuals touch, the simple fact of the matter is that it creates a defense in any criminal case that the prosecuting attorney handling the matter was dishonest. This is similar to the defense proffered by a criminal defendant in *U.S. v. Henthorn*, 931 F.2d 29 (1991), where the 9<sup>th</sup> Circuit Court of Appeals held that if there was evidence in a law enforcement witness’ personnel file that showed “evidence of perjurious conduct or other like dishonesty”, that this should be disclosed to the defense. Likewise here, if Prosecutor Kaneshiro, or his deputies for that matter, were allowed to remain in office, every single prosecution that they would be involved in would be brought into question. Whether there is a federal indictment or a conviction is not the question. The question is whether the very existence of a federal investigation on public

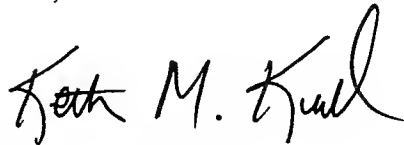
---

<sup>3</sup> An attempt to make the impeachment process clear, at least for state officials, was done in the 2018 Hawaii State Legislature, with the introduction of S.B. No. 2577. Unfortunately this bill failed, but the bill attempted to institute proceedings for impeachment because the: “current law is absent the constitutionally required statutory provisions establishing the causes, manner, and procedure for removal of the governor, lieutenant governor, and appointive officers by impeachment.”

corruption centering on the Honolulu city prosecutor breaches the trust that the public should have in the: “trust and confidence in the integrity of government.” This is not just a lower level deputy that we are speaking of, this is the individual that the Honolulu City Charter states is empowered to act: “on behalf of the people” in “all prosecutions therein for offenses against the laws of the state”. At a minimum, Prosecutor Kaneshiro should have resigned or taken leave (as one of his deputies did), to avoid any appearance that would affect future prosecutions by the Office of the Prosecuting Attorney. It is this failure to resign or take leave while the investigation is pending that constitutes malfeasance, misfeasance or non-feasance in office.

Petitioner has obtained more than 500 signatures, as required by the Honolulu City Charter, agreeing with the impeachment of Prosecutor Kaneshiro. The petition meets the requirements of the Honolulu City Charter stating a case for malfeasance, misfeasance or non-feasance in office. Given the gravity of the charges and the duty imposed upon Prosecutor Kaneshiro by the Honolulu City Charter, this court should grant Petitioner’s request that Prosecutor Kaneshiro be impeached.

DATED: Honolulu, Hawaii, December 18, 2018.

A handwritten signature in black ink, reading "Keith M. Kiuchi", written in a cursive style.

---

KEITH M. KIUCHI

Attorney for Petitioner



IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

TRACY YOSHIMURA,	)	S.P. NO. _____
	)	(Other Civil Action)
Petitioner,	)	
	)	NOTICE OF HEARING ON
vs.	)	PETITION
	)	
KEITH M. KANESHIRO,	)	
	)	
Respondent.	)	
_____	)	

**NOTICE OF HEARING ON PETITION**

**TO: KEITH M. KANESHIRO**  
Prosecuting Attorney for the City and County of Honolulu  
1060 Richards St., 10<sup>th</sup> Floor  
Honolulu, HI 96813

Respondent

PLEASE TAKE NOTICE that the foregoing Petition for Impeachment of Prosecuting Attorney Keith M. Kaneshiro Pursuant to Sec. 12-203 of the Honolulu City Charter, will be presented before the Honorable \_\_\_\_\_, Judge of the above-entitled Court, in the Courtroom of said Judge at 777 Punchbowl St., 4<sup>th</sup> Floor, Honolulu, HI 96813, on the \_\_\_\_ day of \_\_\_\_\_, 2019, at the hour of \_\_\_\_\_ said day, or as soon thereafter as Counsel can be heard.

DATED: Honolulu, Hawaii, December 18, 2018.

  
\_\_\_\_\_  
KEITH M. KIUCHI  
Attorney for Petitioner

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

TRACY YOSHIMURA,	)	S.P. NO. _____
	)	(Other Civil Action)
Petitioner,	)	
	)	CERTIFICATE OF SERVICE
vs.	)	
	)	
KEITH M. KANESHIRO,	)	
	)	
Respondent.	)	
_____	)	

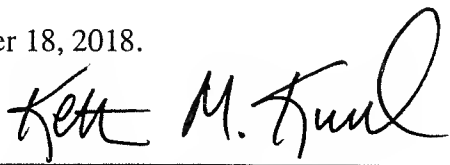
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that upon filing of the aforesaid document, a copy of will be duly hand-delivered or mailed by depositing said copy in the United states mail, postage prepaid, to the following parties at their last known address:

**TO: KEITH M. KANESHIRO**  
Prosecuting Attorney for the City and County of Honolulu  
1060 Richards St., 10<sup>th</sup> Floor  
Honolulu, HI 96813

Respondent

DATED: Honolulu, Hawaii, December 18, 2018.

  
\_\_\_\_\_  
KEITH M. KIUCHI  
Attorney for Petitioner